



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ELM
F. #2015F01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 23, 2018

By E-mail and ECF

Robert J. Cleary, Esq.
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New York, NY 10036

Re: United States v. Dan Zhong
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

The government's filter team hereby furnishes an initial privilege log identifying the English-language documents seized pursuant to search warrants executed at email service providers that were withheld as privileged from the prosecution team. The enclosed log does not reflect any documents previously produced by the filter team to the defendant. The filter team reserves the right to supplement the privilege log as appropriate.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Elizabeth L. Macchiaverna
Elizabeth L. Macchiaverna
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cc: Clerk of the Court (DLI) (by ECF)